

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,)	8:13-CR-310
)	
Plaintiff,)	MOTION TO CONTINUE
)	
vs.)	
)	
PATRICIA WALKER-HALSTEAD,)	
)	
Defendant.)	

COMES NOW the Defendant, Patricia Walker-Halstead, by and through her attorney of record, Stuart J. Dornan, and hereby requests that trial in this matter be continued for the following reasons:

1. The parties are engaged in plea negotiations and need additional time to pursue them.
2. Defendant requests that trial on this matter set for August 10, 2015 be continued.
3. Assistant United States Attorney, Donald J. Kleine, has no objection to Defendant's request for continuance.
4. The Defendant has been advised that a continuance of her trial is being requested and Defendant has no objection to the request.
5. A continuance of the trial date is reasonable and necessary for effective representation based on due diligence of counsel and to avoid a miscarriage of justice.
6. Defendant will submit a speedy trial affidavit waiver forthwith.

WHEREFORE, the Defendant prays the Court grant a continuance of the trial date and for such other and further relief as the Court deems just and equitable.

PATRICIA WALKER-HALSTEAD, Defendant,

By: s/Stuart J. Dornan
STUART J. DORNAN, #A0011658
Attorney for Defendant
Dornan, Lustgarten & Troia PC LLO
1403 Farnam Street, Suite 232
Omaha, Nebraska 68102
(402) 884-7044 (phone)
(402) 884-7045 (fax)
stu@dltlawyers.com

CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2015, I electronically filed the foregoing document with the Clerk of the District Court using the CM/ECF system which sent notification of such filing to the following:

Donald J. Kleine, Assistant United States Attorney

and I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants:

N/A

s/Stuart J. Dornan
STUART J. DORNAN, #18553
Attorney for Defendant